

201-14288



greggs.wj@pg.com on 01/21/2003 12:18:30 PM

To: oppt.ncic@epamail.epa.gov, Rtk Chem/DC/USEPA/US@EPA, Barbara Leczynski/DC/USEPA/US@EPA,
Richard Hefter/DC/USEPA/US@EPA

cc:

Subject: Revised HPV Test Plan - CAS RN 91125-43-8

Attached please find Procter & Gamble's revised test plan for Nonanoic acid,
sulfophenyl ester, sodium salt (NOBS, CAS RN 91125-43-8)

Feel free to contact me with any questions or concerns at greggs.wj@pg.com or
513-627-1383.

Bill Greggs

(See attached file: CAS RN 91125-43-8 - Revision.zip)



CAS RN 91125-43-8 - Revision:



The Procter & Gamble Company
Miami Valley Laboratories
11810 E. Miami River Road
Cincinnati, Ohio 45253
www.pg.com

January 21, 2003

Gov. Christine Todd Whitman, Administrator
United States Environmental Protection Agency
PO Box 1473
Merrifield, VA 22116

Attn: Chemical Right-to-Know Program

Dear Governor Whitman:

Re: EPA Comments on the test plan Nonanoic acid, sulfophenyl ester, sodium salt
(NOBS, CAS RN 91125-43-8)

Dear Administrator Whitman:

The Procter & Gamble Company is pleased to respond to EPA's comments on the test plan for Nonanoic acid, sulfophenyl ester, sodium salt (NOBS, CAS RN 91125-43-8). We have considered the recommended revisions to the environmental fate studies and robust summaries, have revised our submittal as indicated on the attached summary and included an update of the submission reflecting the changes.

EPA or other stakeholders may contact me with any questions or concerns at greggs.wj@pg.com or 513-627-1383.

Sincerely,

William J. Greggs
Product Safety and Regulatory Affairs

**EPA COMMENTS ON NONANOIC ACID, SULFOPHENYL ESTER, SODIUM SALT
CHALLENGE SUBMISSION**

EPA COMMENT: *Photodegradation* .The submitter needs to provide an estimate for atmospheric photodegradation.

ACTION: Calculated AOPWIN v1.90 estimate provided, robust summary updated.

EPA COMMENT: *Fugacity* .The submitter needs to incorporate the actual input values utilized in its estimation for this endpoint.

ACTION: Robust summary updated with input values.

EPA COMMENT: Information missing in the robust summaries for repeated-dose, genetic (*in vivo* cytogenetics study), and developmental toxicity is the purity of the test material.

ACTION: Robust summaries updated with test material purity information.